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SEP 23 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

September 23, 1994

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

Re: Petition for Rule Making - RM-8468
Modification of FM Table of Allotments
Tice, Florida

Dear Mr. Caton:

Gulf Communications Partnership, permittee of WAAD(FM), Tice, Florida, hereby resubmits an original and four copies of its Petition for Rule Making in RM-8468 to upgrade its facilities from a Class A to a Class C2. Pursuant to a meeting with the Commission staff, we understand that this petition will be afforded expedited consideration.

Should there be any questions regarding this matter, kindly communicate directly with the undersigned.

Very truly yours,

Kathleen Victory

Kathleen Victory
Counsel for
Gulf Communications Partnership

Enclosure

cc: Mr. Douglas W. Webbink (w/enc.), by hand
Mr. John Karousos (w/enc.), by hand
Mr. Andrew Rhodes (w/enc.), by hand

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ORIGINAL

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

RECEIVED

SEP 23 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Amendment of Section 73.202(b))
Table of Allotments)
FM Broadcast Stations)
(Tice, Florida))

To: Chief, Allocations Branch

PETITION FOR RULE MAKING

Gulf Communications Partnership ("Gulf"), permittee of Station WAAD(FM), Tice, Florida, by its counsel and pursuant to Section 1.401 of the Commission's Rules, hereby resubmits its Petition for Rule Making requesting that the Commission issue a notice of proposed rule making to amend Section 73.202(b) (the FM Table of Allocations), to substitute Channel 229C2 for Channel 229A at Tice, Florida, and to allow Gulf to upgrade its authorized facilities from a Class A to a Class C2.¹ As discussed further below, in

¹ This Petition was initially filed with the Commission on March 31, 1994. By letter dated September 14, 1994, the Allocations Branch returned the petition ruling that the Gulf proposal violated the "Columbus" doctrine. See *Amendment of Section 73.202(b) Table of Allotments, FM Broadcast Stations (Columbus, Central City, Kearney, Lexington, McCook and Valentine, Nebraska; and Hill City, Kansas, 59 RR2d 1184 (1986)*. (See further discussion below.) After a meeting with counsel for Gulf, the Commission's staff invited Gulf to resubmit the same proposal with the assurance that it would be favorably acted on expeditiously. The petition, as submitted today, is modified only to the extent of updating the procedural history of a related rule making proceeding, incorporating additional arguments regarding the Columbus doctrine, and updating the text to incorporate changes made to the previously-filed proposal through amendments. In this regard, submitted herewith are two engineering statements, one reflecting Gulf's original request for the substitution of Channel 237C2 for Channel 280C2 at Key

order to accomplish this change, it will be necessary also to make the following frequency substitutions:

	<u>Present</u>	<u>Proposed</u>
Naples, FL	228A	284A
Big Pine Key, FL	284C	283C
Key Colony Beach, FL	288C2	267C2

1. WAAD(FM) is the only radio broadcast facility authorized to Tice, Florida. Gulf was awarded the construction permit on February 17, 1993, pursuant to a global settlement in MM Docket 90-505. WAAD, as yet, has not been constructed.² As indicated at Paragraph 7 to the engineering statement of Jefferson G. Brock of Graham Brock Communications, attached hereto as Attachment A (the "Engineering Statement 1"), Gulf's proposal would substantially increase the coverage of its proposed facility. Operating with the requested upgraded facilities, Gulf would provide service to a predicted 505,025 persons, an increase of 247,873 persons (49%) over the predicted coverage of its authorized Class A facility.

2. The substitution of Channel 229C2 for Channel 229A at Tice would require a site restriction of 14.8 kilometers in order to prevent any short-spacing to stations WGYL(FM), Channel 229C2, Vero Beach, and WLVE(FM), Channel 230C, Miami Beach, Florida. As

Colony Beach, and a second statment reflecting Gulf's modified request to substitute Channel 267C2, rather than 237C2, for Channel 280C2 at Key Colony Beach.

² An application for extension of time to construct, filed July 15, 1994, remains pending. See, File No. BMPH-940715JE.

confirmed by the separation study for Channel 229C2³, other than this site restriction, the allocation of Channel 229C2 at Tice can be made in compliance with the Commission's minimum separation requirements as to all other licensed, authorized or requested facilities except WNOG(FM), Channel 228A, Naples, Florida.⁴ Channel 284A, however, can be substituted for Channel 228A at Naples in compliance with the Commission's minimum separation requirements⁵, except with respect to Channel 284C at Big Pine Key.⁶ Operating on Channel 284A from its existing site, WNOG would continue to provide city grade coverage to Naples. Moreover, operating on Channel 284A, WNOG could seek to increase its effective radiated power from 3.0 kilowatts to 6.0 kilowatts. This power increase would enable WNOG to provide service to 148,223 persons within its 1 mV/m contour, an increase of 15,171 persons over the coverage provided by its currently authorized facilities.⁷

3. Substituting Channel 284A at Naples would require modification of the existing Channel 284C allocation at Big Pine Key.⁸ Exhibit 6 of Engineering Statement 1 shows that Channel 283C

³ See Exhibit 2 to the Engineering Statement 1.

⁴ WNOG(FM), Naples, is licensed to Palmer Broadcast Group.

⁵ See Exhibit 4 to the Engineering Statement 1.

⁶ See further discussion below.

⁷ Engineering Statement 1 at ¶7.

⁸ The FM Table of Allotments currently allots Channel 284C to Big Pine Key. In its *Memorandum Opinion and Order*, 55 RR2d 903 (1984), modifying its *Report and Order* in MM Docket 80-90, 55 RR2d 1150 (1983), the Commission automatically downgraded Class C stations unable to meet the Commission's revised minimum

can be substituted for Channel 284C at Big Pine Key in compliance with the Commission's minimum separation requirements, except as to an allotment modification to Channel 280C2 at Key Colony Beach, Florida, made in a recent rule making proceeding.⁹ The Big Pine Key station, operating on Channel 283C from its licensed site, would continue to provide a city grade signal to its community of license.

4. A construction permit for a new FM station, WKKB, to

requirements for Class C facilities to C1s. Hence, while the Table of Allotments has not been amended, Station WWUS(FM), licensed to Crain Broadcasting, Inc. ("Crain"), currently is licensed to operate on Channel 284C1 at Big Pine Key. Crain Broadcasting filed an application to retain its full Class C status (BPH-870302MQ). The Commission returned Crain's application. Crain filed an application for review of the Commission's action returning the application. In its *Memorandum Opinion and Order*, FCC 93-311, released July 2, 1993, the Commission denied Crain's appeal. Crain filed a Petition for Reconsideration of the order denying the Application for Review on August 2, 1993. Crain's Petition is still pending. To accommodate the possibility that the petition might be granted, Gulf's proposal would permit the substitution of a full Class C at Big Pine Key if the Commission grants Crain's petition for reconsideration. In the event that Crain's Petition is denied, Channel 283C1 can be substituted for the current Channel 284C at Big Pine Key without disrupting Gulf's proposal or causing any separation problems not otherwise discussed herein.

⁹ See *Report and Order*, 9 FCC Rcd 4051 (1994) (released August 16, 1994) (the "Key Largo Rule Making"). The submission of a petition for reconsideration of that order on September 21, 1994, by the counterproponents in that proceeding, however, automatically stays the channel modifications granted therein, including the Key Colony Beach allotment, thus leaving the existing FM allotment for WKKB, 288C2, in place. But for the Key Largo Rule Making, Gulf would not need to modify the Key Colony Beach allotment. Regardless of the stay, Gulf's proposal herein requests the submission of Channel 267C2 for 280C2 at Key Colony Beach and is otherwise consistent with the allotment modifications granted in the Key Largo Rule Making (as well as those requested by the counterproponents currently seeking reconsideration of the above-referenced order.)

operate on Channel 288C2 at Key Colony Beach was issued on March 29, 1989. WKKB has not been constructed. There are three available C2 frequencies, 267, 269 and 237¹⁰ which can be substituted at Key Colony Beach to accommodate the changes requested by Gulf. Construction and operation of WKKB from its existing transmitter site on any of these three channels would provide city grade coverage to its community of license and meet the Commission's minimum spacing requirements as to all other licensed and authorized facilities.¹¹ Gulf requests the substitution of Channel 267C2 in lieu of Channel 280C2 at Key Colony Beach.¹²

5. Gulf's proposal comports with the Commission's "Columbus doctrine" regarding changes to existing stations.¹³ While Gulf seeks three non-consensual channel allocation modifications, one of the three affected facilities, WKKB, Key Colony Beach, is an

¹⁰ Although not reflected in the FCC's data base, the use of Channel 237 was proposed in a counterproposal raised in reply comments in the Key Largo Rule Making. Therefore, given the pending petition for reconsideration in that proceeding, and in order to avoid any potential conflict, Gulf will not request the substitution of Channel 237C2 for Channel 280C2 at Key Colony Beach.

¹¹ See Engineering Statements 1 and 2.

¹² See discussion at Paragraph 5 below.

¹³ See, *Columbus*, 59 RR2d 1184 (1986), where the Commission indicated that it would reject petitions for rule making seeking frequency changes to more than two other existing stations for which consent has not been obtained. The Commission's primary rationale for this policy was that proposals involving multiple channel substitutions can be disruptive to the viewing and listening public and to a licensee's ongoing business. *Id.* at 1185.

authorized but unbuilt station.¹⁴ Since WKKB is not an operating station, a modification of its frequency will not result in the sort of disruption which the Columbus doctrine sought to prevent, i.e., disruption to the listening public or to the station's ongoing business. Nonetheless, in order to ensure proper notice, WKKB, Inc., the permittee of WKKB, has been served with a copy of this petition.

6. Even if WKKB should be constructed prior to the final grant of Gulf's proposal¹⁵, the station could be built at its authorized transmitter site¹⁶ and only the modification of the station's frequency thereafter would be required. Moreover, the public interest benefit arising from adoption of the Gulf upgrade proposal clearly outweighs any inconvenience which might be caused to the permittee in eventually constructing and operating his facility on a different frequency.

7. In accordance with the Commission's "Circleville"

¹⁴ See, Notice of Proposed Rule Making, In re Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations. (Dyersburg, Tennessee; Jonesboro, Hoxie and Newport, Arkansas) ("Dyersburg"), 2 FCC Rcd 7466 (1987). Dyersburg dealt with a petition seeking to modify the allotments of two other operating stations and one unbuilt station for which a construction permit was outstanding. There, the Chief of the Allocations Branch cited the Columbus doctrine and found that the proposal could "be entertained because the requested substitutions would affect only two existing stations. The outstanding construction permit . . . represented an unbuilt station, when the petition was filed." *Id.*, ¶5.

¹⁵ On August 5, 1994, the Commission granted WKKB, Inc.'s fifth extension request, extending the time for construction until February 5, 1995.

¹⁶ See Engineering Statement 2.

doctrine,¹⁷ Gulf hereby pledges that, if the Commission grants Gulf's requested modifications of the FM Table of Allotments, it will reimburse the licensees at Naples and Big Pine Key for their expenses involved in changing channels. As indicated above, WKKB is an unbuilt station. The Commission has recognized that the party benefitting from channel changes will not be required to reimburse a permittee of an unbuilt facility for a frequency change since the station is not operating. *Dyersburg*, at 7466.¹⁸ However, if the permittee can establish costs that "directly concerned the previous channel of operation," then the permittee would be entitled to claim reimbursement. *Id.*¹⁹ Therefore, Gulf hereby pledges that, if, and to the extent, deemed appropriate by the Commission, it will pay the reasonable costs incurred by the Key Colony Beach permittee in modifying its channel as a result of Gulf's proposed changes.

8. Further, Gulf affirms that, if the Commission grants the requested modification of the FM Table of Allotments, Gulf will

¹⁷ See, *In re Amendment of Section 73.202(b), FM Broadcast Stations* (Litchfield, Ky., Rolla and Columbia, Mo., Bakersfield, Calif., Sandusky, Mich., Enterprise and Troy, Ala., Ladysmith, Wis., Morris, Minn., Jerseyville, Ill., Augusta, Ga., Brewton and Andalusia, Ala., Wickenburg, Ariz., Potsdam, N.Y., New Albany, Ohio and Circleville, Ohio, 8 FCC 2d 159, 9 RR 2d 1579 (1967)).

¹⁸ Requiring the reimbursement of costs to modify the channel of an unbuilt facility would be akin to requiring reimbursement for the initial construction cost of the station.

¹⁹ However, as noted above, the current Key Colony Beach allotment does not conflict with the Gulf proposal. Only if the now stayed Key Largo Rule Making modifications ultimately are upheld would the modified Key Colony Beach allocation interfere with Gulf's proposal.

promptly file the required minor modification application to move its authorized site to a new location and to upgrade its station to a C2, and upon grant of such application, will promptly construct the newly approved facility. Finally, since none of the requested modifications to the FM Table of Allotments gives rise to the need for any comparative consideration of applicants for a new channel, Gulf's petition for rule making is not affected by the Commission's freeze on comparative hearing proceedings. See, *Public Notice*, FCC-94-41, released February 25, 1994, as modified by *Public Notice*, 94-204, released August 4, 1994.

9. Therefore, in light of the foregoing, Gulf Communications Partnership respectfully requests the Commission to issue a notice of proposed rule making to amend its FM Table of Allotments as follows:

	<u>Present</u>	<u>Proposed</u>
Tice, FL	229A	229C2
Naples, FL	228A	284A
Big Pine Key, FL	284C	283C
Key Colony Beach, FL	288C2	267C2

Respectfully submitted,

GULF COMMUNICATIONS PARTNERSHIP

By Kathleen Victory
Howard M. Weiss
Kathleen Victory
Its attorneys

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September 23, 1994

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

PETITION FOR RULE MAKING
GULF COMMUNICATIONS PARTNERSHIP
SUBSTITUTE CH 229C2 FOR CH 229A
ORDER NAD TO CHANGE CLASS
TICE, FLORIDA
March 1994

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PETITION FOR RULE MAKING
GULF COMMUNICATIONS PARTNERSHIP
SUBSTITUTE CH 229C2 FOR CH 229A
ORDER NEED TO CHANGE CLASS
TICE, FLORIDA
March 1994

TECHNICAL STATEMENT

1. This technical statement and attached exhibits were prepared on behalf of Gulf Communications Partnership ("Gulf"), permittee of Station WAAD, Channel 229A, Tice, Florida. Gulf requests the Commission amend §73.202(b) of its rules to substitute Channel 229C2 for Channel 229A at Tice, Florida. Further, Gulf requests the Commission to modify the WAAD construction permit to change its authorized class. In order to accommodate its request, Gulf requests the following additional changes; the substitution of Channel 284A for Channel 228A at Naples, Florida; the substitution of Channel 283C for Channel 284C at Big Pine Key, Florida; and the substitution of Channel 237C2 for Channel 288C2 at Key Colony Beach, Florida. The specific details of these additional changes are denoted below.

PROPOSAL

2. Gulf requests the Commission substitute Channel 229C2 for Channel 229A at Tice, Florida, at reference coordinates North Latitude 26° 36' 21" and West Longitude 81° 57' 10". An

allotment at the reference coordinates would require a site restriction of 14.8 kilometers west-southwest of Tice to avoid shortspacing WGYL, Channel 229C2, Vero Beach, Florida, and WLVE, Channel 230C, Miami Beach, Florida. From the reference location a 3.16 mV/m contour will be delivered to Tice, Florida. Exhibit #1 is a usable area map for Channel 229C2 at Tice, Florida. Exhibit #2 is a \$73.207 spacing study which demonstrates Channel 229C2 meets the Commission's minimum distance separation requirements to all other licensed, applied for or proposed facilities (with the exception of Channel 228A at Naples, Florida, which is addressed below).

3. Channel 284A can be substituted for Channel 228A at Naples, Florida, at geographic coordinates North Latitude 26° 07' 21" and West Longitude 81° 43' 22". This is the present licensed site for WNOG(FM), Channel 228A, Naples, Florida. Naples will continue to receive 70 dBu, 3.16 mV/m, service from WNOG operating on Channel 284A. Exhibit #3 is a usable area map for Channel 284A at Naples, Florida. Exhibit #4 is a \$73.207 spacing study which demonstrates Channel 284A meets the Commission's minimum distance separation requirements to all other licensed, applied for or proposed facilities. In conducting the channel study for this statement, we have considered station WWUS(FM), Channel 284C, Big Pine Key, Florida, as a full Class C and

request a full Class C substitution accordingly. ¹ (See further discussion of WWUS at Footnote #2 below). However, in the event that the WWUS licensee's pending petition for reconsideration is denied, substitution of Channel 283C1 for Channel 284C1 would similarly accommodate the change requested herein by Gulf and meets §73.207 spacing requirements at the present WWUS transmitter site.

4. Channel 283C can be substituted for Channel 284C at Big Pine Key, Florida, at the present licensed site of WWUS, Channel 284C1, Big Pine Key, at coordinates North Latitude 24° 39' 38" and West Longitude 81° 25' 10". ² From this location, Crane Broadcasting would continue to provide a 3.16 mV/m contour to Big Pine Key. Exhibit #5 is a usable area map for Channel 283C at Big Pine Key, Florida. Exhibit #6 is a spacing study which demonstrates that Channel 283C meets the Commission's minimum

- 1) Even if WWUS remained on Channel 284 as a C1 facility, it is still necessary to relocate the facility to Channel 283 to accommodate the Naples substitution.
- 2) WWUS, licensed to Crane Broadcasting, is presently licensed to operate on Channel 284C1 at Big Pine Key, Florida. However, there remains a pending application to upgrade WWUS to Channel 284C at Big Pine Key (BPH-870302MP). While the application was dismissed by the Commission and the licensee's application for review was denied, the licensee's petition for reconsideration remains pending and §73.202(b) of the Commission's rules still shows Channel 284C as the allocation for Big Pine Key. Therefore, Channel 283C is an equivalent substitute channel. Should WWUS's pending reconsideration be denied, Channel 283C1 can be utilized at the present WWUS site. It should be further noted that a counterproposal was filed in Rm 8081, MM Docket 93-136, (Key Largo) requesting (among other changes) substitution of Channel 283C for Channel 284C at Big Pine Key. That counterproposal was subsequently withdrawn by the party who filed the proposal.

distance separation requirements to all other licensed, applied for or proposed facilities (with the exception of the proposed allotment of Channel 280C2 at Key Colony Beach, Florida, as discussed below).

5. Channel 237C2 can be substituted for Channel 288C2 at Key Colony Beach, Florida, at reference coordinates North Latitude 24° 42' 25" and West Longitude 81° 06' 17". This is the present construction permit site for WKKB, Channel 288C2, Key Colony Beach, Florida. A 3.16 mV/m contour will be provided to all of Key Colony Beach from the proposed location. Exhibit #7 is a usable area map for Channel 237C2 at Key Colony Beach, Florida. Exhibit #8 is a \$73.207 spacing study which demonstrates Channel 237C2 meets the Commission's minimum distance separation requirements to all other licensed, applied for or proposed facilities.

6. Therefore, Gulf requests the following changes to the FM Table of Allotments:

Tice, Florida

Present	Proposed
229A	229C2

- 3) WKKB, Channel 288C2, Key Colony Beach, authorized to Richard L. Silva, is currently unbuilt. A proposal is pending in the Key Largo rule making, Rm 8081, MM Docket 93-136, to change the Key Colony Beach allotment from Channel 288C2 to Channel 280C2. The potential allocation of Channel 280C2 conflicts with the proposed substitution of Channel 283C at Big Pine Key, Florida. Channel 237C2, without interfering with the changes sought in that proceeding, can be substituted for the proposed Channel 280C2 in the Key Largo proceeding, thereby eliminating the need for a subsequently change from Channel 280C2 to Channel 237C2 for WKKB.

Naples, Florida

Present	Proposed
228A, 233C 276C3	233C, 276C3 284A

Big Pine Key, Florida

Present	Proposed
284C	283C

Key Colony Beach, Florida

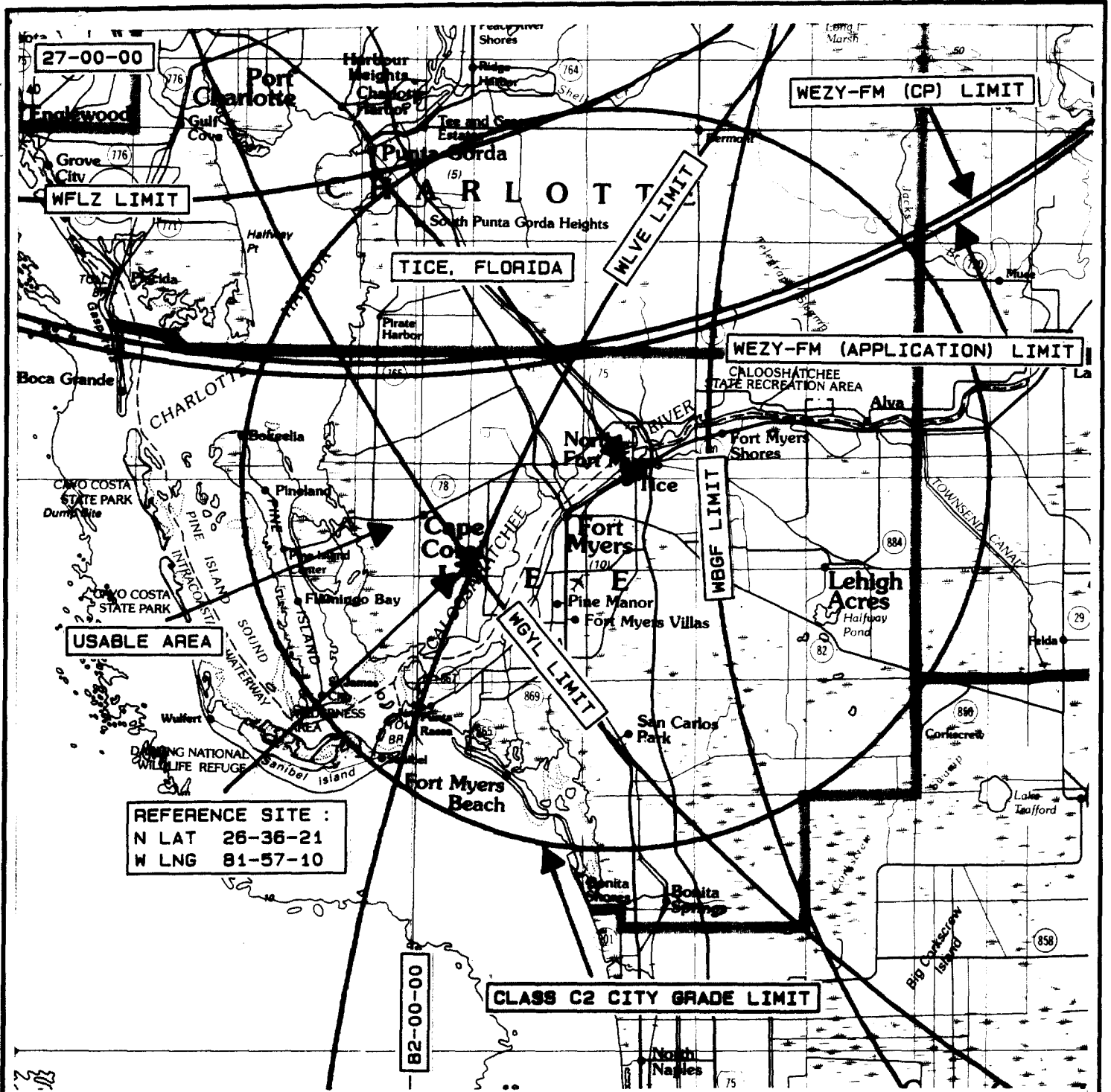
Present	Proposed
288C2	237C2

PUBLIC INTEREST ASPECTS

7. The allocation of Channel 229C2 will enable WAAD to provide 1.0 mV/m service to 506,025 persons in 5,563.9 square kilometers (land area only). This is an increase of 247,873 persons over the facilities specified in its presently authorized Class A construction permit. Additionally, the substitution of Channel 284A for Channel 228A at Naples, Florida, will enable WNOG to increase its effective radiated power from 3.0 to 6.0 kilowatts. WNOG-FM then has the potential to increase population served from 133,052 persons to 148,223 persons within its 1.0 mV/m contour, a net gain of 15,171 persons. ⁴

4) All population data was extracted from the 1990 Census, PL94-171 files.

8. The foregoing technical statement and attached exhibits were prepared for Gulf Communications Partnership by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. Should questions arise during consideration of this technical statement and exhibits, we would welcome the opportunity to discuss the matter by phone at 912-638-8028. All data relating to authorized, applied for or proposed facilities (FM stations) was extracted from the NTIA database, as updated January 26, 1994. We assume no liability for omissions or errors in that database.



USABLE AREA CHANNEL 229C2

MAP IS A PORTION OF THE 1: 500, 000 SCALE
U.S.G.S. BASE MAP OF FLORIDA.

MAP ASSUMES WNOG-FM ON CHANNEL 284A AT
NAPLES, FLORIDA.

SCALE 1: 500, 000

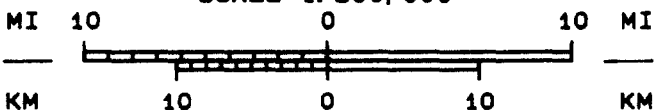


EXHIBIT #1

PETITION FOR RULE MAKING
GULF COMM. PARTNERSHIP
SUB CHANNEL 229C2 FOR 229A
ORDER WAAD TO CHANGE CLASS
TICE, FLORIDA

March 1994

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

ALLOCATION STUDY FOR CHANNEL 229C2 TICE, FLORIDA
USING PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE	CLASS C2	DISPLAY DATES
26 36 21 N	Current rules spacings	DATA 01-26-94
81 57 10 W	CHANNEL 229 - 93.7 MHz	SEARCH 03-08-94

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD229	229C2 Tice		FL	0.0	0.00	190.0	-190.00
	26 36 21	81 57 10	0.000 kW	OM	0.0	118.1	
	Gulf Comm. Partnership						
WAAD.C	229A Tice		FL	41.9	16.32	166.0	-149.68
CP CN	26 42 56	81 50 36	3.000 kW	100M	10.1	103.2	
	Gulf Comm. Partnership BPH-880518MK						
WLVE	230C Miami Beach		FL	112.1	188.00	188.0	0.00
LI ZEN	25 57 59	80 12 33	100.000 kW	307M	116.8	116.8	
	Paxson Miami License Limited BLH-920522KB						
WGYL	229C2 Vero Beach		FL	54.5	190.00	190.0	0.00
LI CN	27 36 04	80 23 33	50.000 kW	146M	118.1	118.1	
	Sandbab Communications Ltd. BLH-911021KD						
WEZYFM	231C Lakeland		FL	355.8	121.84	105.0	16.84
AP CN	27 42 09	82 02 32	100.000 kW	323M	75.7	65.3	
	Chapman S. Root 1982 Living Trust BPH-930914IF						
WEZYFM	231C Lakeland		FL	356.0	122.93	105.0	17.93
CP CN	27 42 45	82 02 25	100.000 kW	320M	76.4	65.3	
	Chapman S. Root 1982 Living Trust BPH-850305IG						
WBGF	228A Belle Glade		FL	84.5	127.01	106.0	21.01
LI CN	26 42 56	80 40 58	3.000 kW	78M	78.9	65.9	
	Seminole Broadcasting Co. BLH-800418AC						
WFLZ	227C Tampa		FL	347.4	140.39	105.0	35.39
LI CY	27 50 32	82 15 46	100.000 kW	414M	87.3	65.3	
	Jacor Broadcasting of Tampa Bay BLH-880627KA						
WMMZ	229C Ocala		FL	357.6	295.31	249.0	46.31
LI CN	29 16 06	82 04 51	100.000 kW	411M	183.5	154.8	
	Ocala Broadcasting Corp. BLH-870915KA						

ALLOCATION STUDY CHANNEL 229C2

STUDY ASSUMES THAT WNOG-FM NAPLES, FLORIDA
IS OPERATING ON CHANNEL 284A.

EXHIBIT #2

PETITION FOR RULE MAKING
GULF COMM. PARTNERSHIP
SUB CHANNEL 229C2 FOR 229A
ORDER WAAD TO CHANGE CLASS
TICE, FLORIDA
March 1994

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

ALLOCATION STUDY FOR NAPLES, FLORIDA
USING WNOG-FM/PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE	CLASS A	DISPLAY DATES
26 07 21 N		DATA 01-26-94
81 43 22 W	Current rules spacings	SEARCH 03-08-94
----- CHANNEL 284 -104.7 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD284	284A	Naples	FL	0.0	0.00	115.0	-115.00
	26 07 21	81 43 22	0.000 kW	0M	0.0	71.5	
Gulf Comm. Partnership							
WWUS.A	284C	Big Pine Key	FL	169.3	164.80	226.0	-61.20
AP CN	24 39 38	81 25 10	620.000 kW	135M	102.4	140.5	
Crain Broadcasting, Inc. BPH-870302MQ							
> to Channel 283C							
WWUS	284C1	Big Pine Key	FL	169.3	164.80	200.0	-35.20
LI CN	24 39 38	81 25 10	100.000 kW	132M	102.4	124.3	
Crain Broadcasting, Inc. BLH-870716KA							
> to Channel 283C							
* AD283	283C	Big Pine Key	FL	169.3	164.80	165.0	-0.20
	24 39 38	81 25 10	0.000 kW	0M	102.4	102.6	
Gulf Comm. Partnership							
WRBQFM	284C1	Tampa	FL	340.1	215.00	200.0	15.00
LI CN	27 56 50	82 27 35	100.000 kW	171M	133.6	124.3	
Edens Broadcasting, Inc. BLH-6052							
WMMY.C	285A	Solana	FL	339.1	91.48	72.0	19.48
CPMZCN	26 53 37	82 03 03	6.000 kW	97M	56.9	44.8	
West Florida Media, Inc. BMPH-930129IA							

ALLOCATION STUDY CHANNEL 284A

* NOTE : THE CLEARANCE TO CHANNEL 283C IS LESS THAN -0.5 KILOMETERS AND THEREFORE ROUNDS TO ZERO.

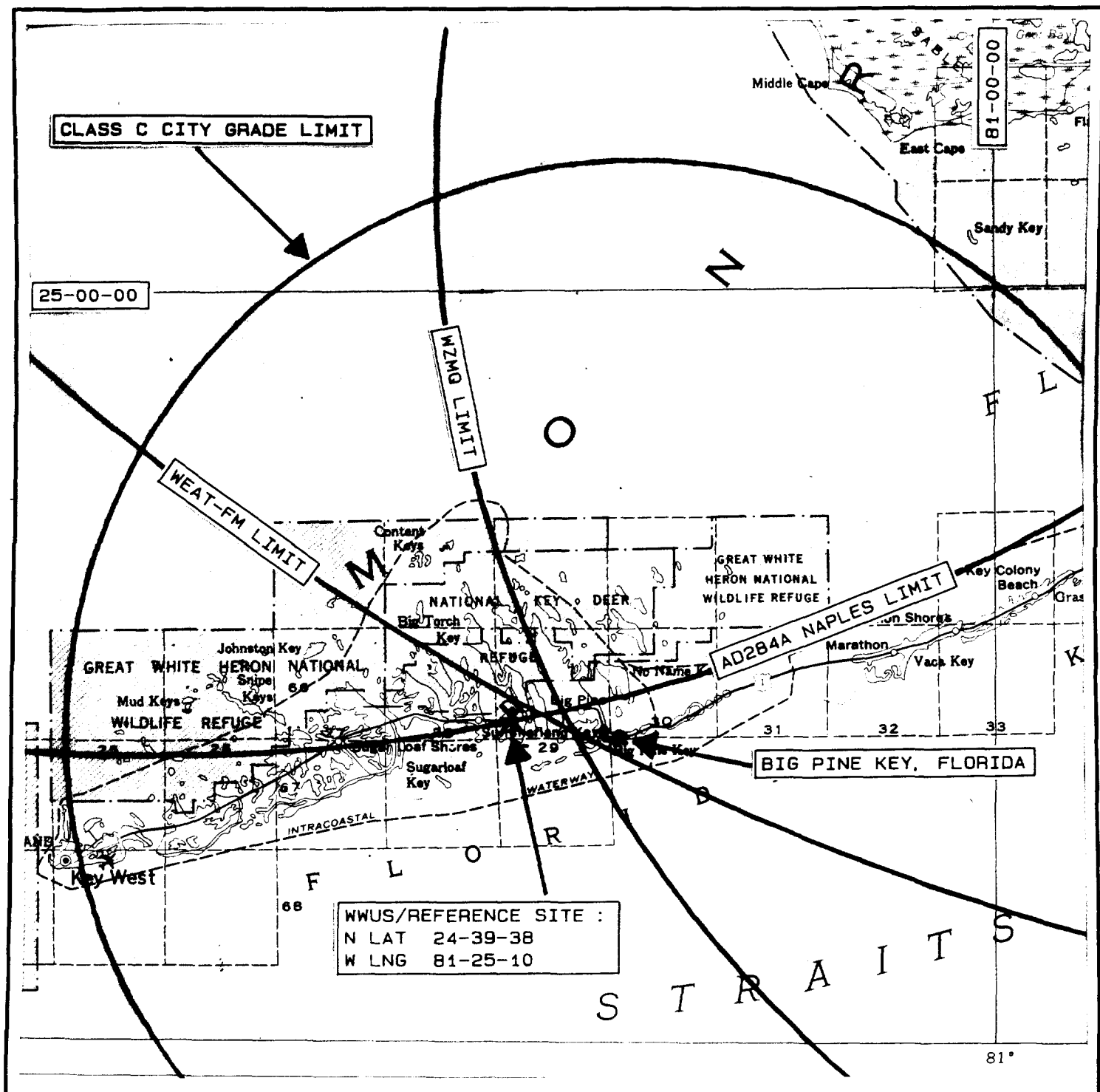
EXHIBIT #4

PETITION FOR RULE MAKING
GULF COMM. PARTNERSHIP
SUB CHANNEL 229C2 FOR 229A
ORDER WAAD TO CHANGE CLASS
TICE, FLORIDA

March 1994

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS



USABLE AREA CHANNEL 283C

MAP IS A PORTION OF THE 1: 500,000 SCALE
U.S.G.S. BASE MAP OF FLORIDA.

THE CITY GRADE LIMIT IS DEPICTED AS A
MINIMUM CLASS C FACILITY, SINCE EVEN A
MINIMUM CLASS C STATION COULD ADEQUATELY
COVER BIG PINE KEY.

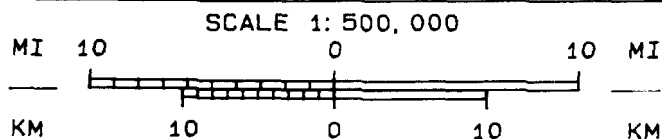


EXHIBIT #5

PETITION FOR RULE MAKING
GULF COMM. PARTNERSHIP
SUB CHANNEL 229C2 FOR 229A
ORDER WAAD TO CHANGE CLASS
TICE, FLORIDA

March 1994

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

ALLOCATION STUDY FOR BIG PINE KEY, FLORIDA
USING WWUS/PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE		CLASS C	DISPLAY DATES
24 39 38 N			DATA 01-26-94
81 25 10 W		Current rules spacings	SEARCH 03-08-94
----- CHANNEL 283 -104.5 MHz -----			

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD283	283C	Big Pine Key	FL	0.0	0.00	290.0	-290.00
	24 39 38	81 25 10	0.000 kW	OM	0.0	180.2	
Gulf Comm. Partnership							
WWUS.A	284C	Big Pine Key	FL	0.0	0.00	241.0	-241.00
AP CN	24 39 38	81 25 10	620.000 kW	135M	0.0	149.8	
Crain Broadcasting, Inc. BPH-870302MQ							
WWUS	284C1	Big Pine Key	FL	0.0	0.00	209.0	-209.00
LI CN	24 39 38	81 25 10	100.000 kW	132M	0.0	129.9	
Crain Broadcasting, Inc. BLH-870716KA							
* AD284	284A	Naples	FL	349.3	164.80	165.0	-0.20
	26 07 21	81 43 22	0.000 kW	OM	102.4	102.6	
Gulf Comm. Partnership							
WEATFM	282C	West Palm Beach	FL	29.1	243.00	241.0	2.00
LI ZCN	26 34 37	80 14 32	100.000 kW	388M	151.0	149.8	
J.J. Taylor Companies, Inc. BLH-920501KB							
DE280	280C2	Key Largo	FL	64.2	109.55	105.0	4.55
DE	25 05 29	80 26 37	0.000 kW	OM	68.1	65.3	
Spanish Broadcasting System RM-8161 921217							
>PRM							
WZMQ	280C2	Key Largo	FL	64.2	109.55	105.0	4.55
LI ZCN	25 05 29	80 26 37	50.000 kW	73M	68.1	65.3	
Spanish Broadcasting System BLH-930427KA							

ALLOCATION STUDY CHANNEL 283C

* NOTE : THE CLEARANCE TO CHANNEL 284A IS
LESS THAN -0.5 KILOMETERS AND
THEREFORE ROUNDS TO ZERO.

EXHIBIT #6

PETITION FOR RULE MAKING
GULF COMM. PARTNERSHIP
SUB CHANNEL 229C2 FOR 229A
ORDER WAAD TO CHANGE CLASS
TICE, FLORIDA

March 1994

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

ALLOCATION STUDY FOR KEY COLONY BEACH, FLORIDA
USING WKKB/PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE	CLASS C2	DISPLAY DATES
24 42 25 N		DATA 01-26-94
81 06 17 W	Current rules spacings	SEARCH 03-08-94
----- CHANNEL 237 - 95.3 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD237	237C2	Key Colony Beach	FL	0.0	0.00	190.0	-190.00
	24 42 25	81 06 17	0.000 kW	OM	0.0	118.1	
Gulf Comm. Partnership							
WOLZ	237C1	Fort Myers	FL	334.5	235.33	224.0	11.33
LI CY	26 37 25	82 06 56	100.000 kW	138M	146.3	139.2	
Beachside West Broadcasting, Inc.				BLH-890830KC			
WXDJ	239C1	Homestead	FL	34.8	112.39	79.0	33.39
LI CN	25 32 24	80 28 07	100.000 kW	299M	69.8	49.1	
New Age Broadcasting, Inc.				BLH-870717KB			

ALLOCATION STUDY CHANNEL 237C2

EXHIBIT #8
PETITION FOR RULE MAKING
GULF COMM. PARTNERSHIP
SUB CHANNEL 229C2 FOR 229A
ORDER WAAD TO CHANGE CLASS
TICE, FLORIDA
March 1994

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

*State of Georgia)
St. Simons Island)ss:
County of Glynn)*

JEFFERSON G. BROCK, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Gulf Communications Partnership, permittee of Radio Stations WAAD, to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.


The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 17th day of March, 1994



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 17th day of March, 1994*



Notary Public, State of Georgia
My Commission Expires: September 8, 1995